

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 05-10010-NMG
)
)
JOHN MONTONI)
)

**GOVERNMENT'S MOTION FOR DOWNWARD ADJUSTMENT
BASED ON TIMELY ACCEPTANCE OF RESPONSIBILITY**

The United States of America, through Michael J. Sullivan, the United States Attorney for the District of Massachusetts, and William D. Weinreb and Gregg D. Shapiro, Assistant U.S. Attorneys, respectfully moves the Court, pursuant to U.S.S.G. § 3E1.1, for an additional one-level downward adjustment in defendant John Montoni's offense level on the ground that he assisted authorities in the investigation and prosecution of his own misconduct by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the Court to allocate their resources efficiently.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ William D. Weinreb
WILLIAM D. WEINREB
GREGG D. SHAPIRO
Assistant U.S. Attorney

